

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RED TREE INVESTMENTS, LLC,

Plaintiff,

-against-

Docket No. 1:19-cv-02523
(related to 1:19-cv-02519)

PETRÓLEOS DE VENEZUELA, S.A. and
PDVSA PETRÓLEO, S.A.,
Defendants.

**MOTION AND PROPOSED ORDER OF WITHDRAWAL
BY QUINN EMANUEL URQUHART & SULLIVAN LLP AS COUNSEL OF RECORD
TO RED TREE INVESTMENTS, LLC**

PLEASE TAKE NOTICE that upon the below affirmation of Daniel Salinas-Serrano, Quinn Emanuel Urquhart & Sullivan LLP (“Quinn Emanuel”) hereby moves this Court for an order relieving it from acting as counsel of record for Plaintiff Red Tree Investments, LLC (“Red Tree”). Quinn Emanuel specifically requests that Daniel Salinas-Serrano, Stephen Andrew Broome, and Victor Noskov, who have appeared on behalf of Red Tree in this matter, be removed from the docket as counsel for Red Tree.

In support of such motion and in conformance with Local Rule 1.4, Daniel Salinas-Serrano affirms the following:

1. Red Tree consents to the withdrawal of Quinn Emanuel. MoloLamken LLP have appeared as new counsel for Red Tree in this matter.
2. The withdrawal of Quinn Emanuel will not affect any deadlines, cause any delay, or otherwise prejudice Red Tree in any way.
3. Quinn Emanuel is not seeking a retaining or charging lien.

Dated: September 18, 2020

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ *Daniel Salinas-Serrano*
Daniel Salinas-Serrano
Stephen Andrew Broome
Victor Noskov

51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel: (212) 849-7000
Fax: (212) 849-7100
Counsel for Red Tree Investments, LLC

Entered this ____ day of September, 2020

SO ORDERED.

Honorable Alison J. Nathan
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2020, I caused a true and correct copy of Quinn Emanuel Urquhart & Sullivan LLP's Motion to Withdraw as Counsel of Record to be served by electronic means on Plaintiff Red Tree Investments, LLC and on counsel to all parties.

By: */s/ Daniel Salinas-Serrano*
Daniel Salinas-Serrano

51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel: (212) 849-7000
Fax: (212) 849-7100
Counsel for Red Tree Investments, LLC